



## U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 17, 2022

**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: ***United States v. Michael Avenatti, 19 Cr. 374 (JMF)***

Dear Judge Furman:

The Government respectfully submits this letter pursuant to the Court's Amended Scheduling Order (Dkt. No. 160 at 2) to provide (1) a list of jurors that the parties agree should be excused for cause based on the juror questionnaires and (2) a list of jurors that only the Government requests be excused for cause based on the juror questionnaires.

The parties agree that the following 41 jurors (identified by juror number) should be excused for cause based on the juror questionnaires:

2	81	126
5	85	127
9	88	130
32	96	133
33	103	136
37	104	137
39	108	141
51	113	143
56	114	146
66	117	148
68	119	153
69	121	156
71	122	157
74	125	

Honorable Jesse M. Furman  
United States District Judge  
January 17, 2022  
Page 2

The Government also requests that the following two jurors be excused for cause based on the juror questionnaires:

Juror Number	Reasons Juror Should Be Excused
59	Answers to questions 34, 35, 36, 41, 42, 43, 49, 50, 65, 68, 71, 72, 78, 79, 80, and 81
152	Answers to questions 61, 62, 85, 87, and 88

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: s/  
Matthew D. Podolsky  
Andrew A. Rohrbach  
Robert B. Sobelman  
Assistant United States Attorneys  
(212) 637-1947/2345/2616

cc: Robert M. Baum, Esq. (by ECF)  
Andrew J. Dalack, Esq. (by ECF)  
Tamara L. Giwa, Esq. (by ECF)